

# EXHIBIT II

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION

CHARLENE CARTER )  
)  
) CIVIL ACTION NO.  
VS. ) 3:17-CV-02278-X  
)  
SOUTHWEST AIRLINES CO., AND )  
TRANSPORT WORKERS UNION OF )  
AMERICA, LOCAL 556 )

-----  
CONFIDENTIAL  
TWU LOCAL 556 30(b)(6)  
ORAL DEPOSITION OF  
AUDREY STONE  
NOVEMBER 30, 2020  
-----

ANSWERS AND DEPOSITION OF AUDREY STONE,  
produced as a witness at the instance of the  
Plaintiff, taken in the above-styled and -numbered  
cause on NOVEMBER 30, 2020, at 9:00 a.m., before  
CHARIS M. HENDRICK, a Certified Shorthand Reporter  
in and for the State of Texas, witness located in  
Orting, Washington, pursuant to the Federal Rules  
of Civil Procedure, the current emergency order  
regarding the COVID-19 State of Disaster, and the  
provisions stated on the record or attached hereto.

1 A P P E A R A N C E S

2 FOR THE PLAINTIFF:

3 MR. MATTHEW B. GILLIAM  
4 NATIONAL RIGHT TO WORK LEGAL DEFENSE  
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9 mbg@nrtw.org

10 FOR THE DEFENDANT, SOUTHWEST AIRLINES CO.:

11 MR. MICHAEL A. CORRELL  
12 REED SMITH LLP  
13 2850 North Harwood, Suite 1500  
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15 (469) 680-4264  
16 mcorrell@reedsmith.com

17 FOR THE DEFENDANT, TRANSPORT WORKERS UNION OF  
18 AMERICA, LOCAL 556:

19 MR. ADAM GREENFIELD  
20 MR. EDWARD B. CLOUTMAN, III  
21 LAW OFFICES OF CLOUTMAN & GREENFIELD, PLLC  
22 3301 Elm Street  
23 Dallas, Texas 75226  
24 (214) 939-9223  
25 agreenfield@candglegal.com  
ecloutman@lawoffices.email

FOR THE WITNESS, AUDREY STONE:

MR. JOE GILLESPIE  
GILLESPIE SANFORD LLP  
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Dallas, Texas 75246  
(214) 800-5111  
joe@gillespiesanford.com

ALSO PRESENT: MS. CHARLENE CARTER  
MS. LAUREN ARMSTRONG

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1 PROCEEDINGS

2 THE REPORTER: Today's date is  
3 November 30, 2020. The time is 9:00 a.m. Central  
4 Standard Time. This is the oral deposition of  
5 Audrey Stone, and it is being conducted remotely in  
6 accordance with the current emergency order  
7 regarding the COVID-19 State of Disaster. The  
8 witness is located in Orting, Washington and  
9 counsel has agreed that I can swear her in out of  
10 state.

11 My name is Charis Hendrick, Court  
12 Reporter, CSR No. 3469. I am administering the  
13 oath and reporting the deposition remotely by  
14 stenographic means from my home in Ellis County,  
15 Texas. The witness has been identified to me  
16 through counsel.

17 Would counsel please state their  
18 appearances and locations for the record? And the  
19 city is fine.

20 MR. GILLIAM: Matthew B. Gilliam for  
21 plaintiff Charlene Carter in Springfield, Virginia.

22 MR. GREENFIELD: Adam Greenfield on  
23 behalf of Transportation Workers Union Local 556 on  
24 behalf of the union. And just for the record, this  
25 is a Rule 30(b)(6) deposition and Ms. Stone is

1 being designated for certain topics. It's not  
2 specifically her deposition.

3 MR. CORRELL: Michael Correll for the  
4 defendant Southwest Airlines.

5 MR. CLOUTMAN: Sorry, Mike. And this  
6 is Ed Cloutman also for TWU Local 556, Dallas,  
7 Texas.

8 MR. GILLESPIE: And this is Joseph  
9 Gillespie on behalf of the witness, Audrey Stone.

10 AUDREY STONE,  
11 having been first duly sworn, testified as follows:

12 EXAMINATION

13 BY MR. GILLIAM:

14 Q. Good morning, Ms. Stone. As  
15 Mr. Greenfield stated, this is a Rule 30(b)(6)  
16 deposition of Transport Workers Union of America  
17 Local 556; and that's your understanding as well?

18 A. Yes.

19 Q. Okay. And you are the designated  
20 representative of Local 556, correct?

21 A. Yes.

22 Q. Okay. And if I say Local 556 or the  
23 union, you understand that I mean Transport Workers  
24 Union of America Local 556?

25 A. Yes.

1 reports on -- on the officer elections?

2 A. Yes.

3 Q. Okay. And what do their reports say?

4 A. Their reports contain the voting  
5 statistics; typically, broken down both by  
6 domicile, as well as overall participation, total  
7 membership numbers and the final vote in terms of  
8 the outcome of the vote.

9 Q. Okay. And are those board of election  
10 reports disseminated to the executive board?

11 A. Yes, they are presented to the executive  
12 board.

13 Q. Okay. And do the -- are the reports, I  
14 guess, presented to the membership -- the rest of  
15 the membership?

16 A. Yes, they are.

17 Q. Okay. All right. And you said you also  
18 reviewed both of the tentative agreement contract  
19 votes. Are those -- or, I guess, is that voting  
20 information contained in a specific type of report?

21 A. It's documents that the board of election  
22 prepares.

23 Q. Okay. All right. And for the first  
24 tentative agreement, do you recall how many --  
25 well, let me ask it this way: For the first

1 tentative agreement, do you know what percentage of  
2 the union membership voted to ratify the first TA?

3 A. It was approximate -- I am sorry. That  
4 voted to ratify the TA?

5 Q. Yes.

6 A. In the first tentative agreement?

7 Q. Yes, ma'am.

8 A. That was approximately 13 percent.

9 Q. Okay. And what percentage voted to ratify  
10 the second tentative agreement?

11 A. That was approximately 54 percent of the  
12 eligible members that voted.

13 Q. Okay. All right. Last time, I guess,  
14 during -- during your last deposition, we talked a  
15 little bit about collective bargaining agreement  
16 negotiations. When you became president, were  
17 contract negotiations already underway?

18 A. No, they were not.

19 Q. And was the contract -- do you recall when  
20 that first contract became amendable?

21 A. June 1st, 2013.

22 Q. Okay. Now, in June 1st, 2013, were you,  
23 as president, the lead negotiator for TWU Local  
24 556?

25 A. I don't believe I was as of June 1st,



1 I, AUDREY STONE, have read the foregoing  
2 deposition and hereby affix my signature that same  
3 is true and correct, except as noted above.  
4

5 \_\_\_\_\_  
6 AUDREY STONE

7 THE STATE OF \_\_\_\_\_  
8 COUNTY OF \_\_\_\_\_

9 Before me, \_\_\_\_\_, on this day  
10 personally appeared AUDREY STONE, known to me (or  
11 proved to me under oath or through \_\_\_\_\_) to  
12 be the person whose name is subscribed to the  
13 foregoing instrument and acknowledged to me that  
14 they executed the same for the purposes and  
15 consideration therein expressed.

16  
17 Given under my hand and seal of office this \_\_\_\_\_  
18 day of \_\_\_\_\_, 2020.  
19

20 \_\_\_\_\_  
21 NOTARY PUBLIC IN AND FOR THE  
22 STATE OF \_\_\_\_\_  
23

24 MY COMMISSION EXPIRES: \_\_\_\_\_  
25

1 REPORTER'S CERTIFICATION  
2 IN THE UNITED STATES DISTRICT COURT  
3 FOR THE NORTHERN DISTRICT OF TEXAS  
4 DALLAS DIVISION  
5 CHARLENE CARTER )  
6 )  
7 ) CIVIL ACTION NO.  
8 VS. ) 3:17-CV-02278-X  
9 )  
10 SOUTHWEST AIRLINES CO., AND )  
11 TRANSPORT WORKERS UNION OF )  
12 AMERICA, LOCAL 556 )  
13 )

14 -----  
15 CONFIDENTIAL  
16 TWU LOCAL 556 30(b)(6)  
17 DEPOSITION OF AUDREY STONE  
18 NOVEMBER 30, 2020  
19 (REPORTED REMOTELY)  
20 -----

21 I, CHARIS M. HENDRICK, Certified Shorthand  
22 Reporter in and for the State of Texas, do hereby  
23 certify to the following:

24 That the witness, AUDREY STONE, was by me  
25 duly sworn and that the transcript of the oral  
deposition is a true record of the testimony given  
by the witness.

I further certify that pursuant to Federal  
Rules of Civil Procedure, Rule 30(e)(1)(A) and (B)  
as well as Rule 30(e)(2), that review of the  
transcript and signature of the deponent:

\_\_\_\_xx\_\_\_\_ was requested by the deponent and/or a

1 party before completion of the deposition.

2 \_\_\_\_\_ was not requested by the deponent and/or  
3 a party before the completion of the deposition.

4 I further certify that I am neither  
5 attorney nor counsel for, nor related to or  
6 employed by any of the parties to the action in  
7 which this deposition is taken and further that I  
8 am not a relative or employee of any attorney of  
9 record in this cause, nor am I financially or  
10 otherwise interested in the outcome of the action.

11 The amount of time used by each party at  
12 the deposition is as follows:

13 Mr. Gilliam - 2:43 hours/minutes  
14

15 Subscribed and sworn to on this 8th day of  
16 December, 2020.

17

18

19

20

21

22

23

24

25

*Charis M Hendrick*

CHARIS M. HENDRICK, CSR # 3469  
Certification Expires: 10-31-21  
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